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January 21, 2025

VIA ECF FILING

United States Magistrate Judge Stacey D. Adams
Frank R. Lautenberg U.S. Post Office & Courthouse Building
2 Federal Square
Newark, NJ 07102

Re: John Doe v. Baila Sebrow
United States District Court, District of New Jersey
Case No.: 2:21-cv-20706
Response to January 17, 2025 Letter from Daniel Szalkiewicz, Esq.

Dear Judge Adams,

As Your Honor is aware, my Law Office represents the Defendant, Ms. Betty Sebrow, in the above referenced matter. I write this letter in response to a letter submitted to the Court by Mr. Daniel Szalkiewicz, counsel to the Plaintiff, on January 17, 2025.

As Mr. Szalkiewicz states in his letter, Mr. Szalkiewicz contacted me, pursuant to Your Honor's rules, seeking information and documents prior to filing a formal motion.

In his letter, Mr. Szalkiewicz stated as follows:

"I asked Mr. Heller if he would voluntarily provide information regarding the trust and disbursements of the settlement funds. Mr. Heller informed me he would not consent to the disclosure of the information and that we would need to obtain a court order."

This is not precisely what I communicated to Mr. Szalkiewicz. Rather, I explained that neither I nor Ms. Sebrow were authorized to provide him with the documents or information he was seeking. I further clarified that the funds he referenced represent the proceeds of a settlement, the beneficiary of which was the Estate of David Sebrow. These funds were subsequently bequeathed directly to Mr. Sebrow's children, not to Ms. Sebrow, well before the advent of this litigation.

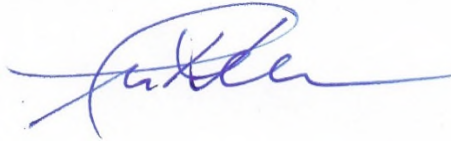
Mr. Szalkiewicz references the Last Will and Testament of David Sebrow, dated December 2010, which he attached as an exhibit to his letter. He highlights paragraph 2 of the Will, but seems unaware of the following clause, labeled 2a, which states as follows:

Any interest or ownership t may have upon my demise in WORBES CORP., WORBES LEASING CORP., and /or S & S SOAP CO., INC., all New York corporations, I hereby give, devise and bequest as follows: two-thirds (66.6666%) to my son JEFFREY ISSAC SEBROW and one third (33.333%) to my daughter, LAURA SEBROW

The settlement Mr. Szalkiewicz refers to was on behalf Worbes Corporation, which went not to Betty Sebro, but to David Sebro's children. It is for this reason that I directed Mr. Szalkiewicz back to the Court, not out of gratuitous uncooperativeness, but because neither I nor Ms. Sebro possessed any authority to provide Mr. Szalkiewicz with the documents or information he was seeking. Accordingly, if Mr. Szalkiewicz seeks to obtain these documents, it will be incumbent upon him to demonstrate their relevance to this matter, and that his client is entitled to them.

Thanking Your Honor for your kind attention to this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Ira W. Heller', with a long horizontal flourish extending to the right.

Ira W. Heller, Esq.

cc: Daniel Szalkiewicz, Esq.
Attorney for Plaintiff

Cali Madia, Esq.
Attorney for Plaintiff